

From: [Thomas Steeger](#)
To: [Marianna.PAOLINO@ec.europa.eu](#)
Subject: RE: OECD Expert Group on Honey Bee Toxicity Testing
Date: 11/06/2012 10:55 AM
Attachments: [Pollinator Risk Assessment Framework White Paper.pdf](#)

Greetings Marianna,

Please find attached the white paper that EPA recently presented to the Scientific Advisory Panel outlining our proposed risk assessment framework for pollinators.



Pollinator Risk Assessment Framework White Paper.pdf

With respect to the neonicotinoids, below is a brief outline of where EPA is at. The schedule for beginning the Registration Review is as follows

- The registration review docket for imidacloprid opened in December 2008.
- Dockets for clothianidin, dinotefuran, and thiamethoxam opened December 2011.
- Dockets for acetamiprid and thiacloprid will open in the fourth quarter FY 2012.

In general, EPA believes that the neonicotinoid insecticides have a common mode of action that affects the central nervous system of insects, causing paralysis and death. All of the neonicotinoids were registered after 1984 so none were subject to reregistration. Some uncertainties have been identified since their initial registration regarding these pesticides' potential environmental fate and effects, especially as they relate to pollinators. Data suggest that residues of neonicotinoids can accumulate in pollen and nectar of treated plants and may represent a potential exposure to pollinators. Adverse effects data as well as beekill incidents have also been reported; these highlight the potential effects of neonicotinoid pesticides. Among other refinements to the ecological risk assessment during Registration Review, EPA will consider potential effects of the neonicotinoids to honeybees and other pollinating insects.

I can provide links to the individual dockets that have been established for the neonicotinoid insecticides if you are interested. Please let me know if you need additional information.

Tom

Thomas Steeger, Ph.D.
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(703) 305-5444 (office)

▼ --11/06/2012 10:11:18 AM---Dear Tom Steeger, Thank you for your e-mail.

From: <[Marianna.PAOLINO@ec.europa.eu](#)>
To: Thomas Steeger/DC/USEPA/US@EPA
Cc: <[Francesca.ARENA@ec.europa.eu](#)>
Date: 11/06/2012 10:11 AM
Subject: RE: OECD Expert Group on Honey Bee Toxicity Testing

Dear Tom Steeger,

Thank you for your e-mail.

I also appreciate having had the opportunity to meet you, Ms Kris Garber and Mr Wayne Hou.

I would take immediately the occasion to ask you the white paper on the risk assessment for pollinators you mentioned in the presentation.

In addition, I would like also to know where I could find the most updated information on the state of play of the US authorisation for neonicotinoids.

Please feel free to contact me if you need any information on the EU framework legislation and/or you have specific questions on honeybee health strategy, neonicotinoids, or related topics.

Kind regards,
Marianna Paolino

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From: Steeger.Thomas@epamail.epa.gov [mailto:Steeger.Thomas@epamail.epa.gov]
Sent: Friday, November 02, 2012 6:03 PM
To: PAOLINO Marianna (SANCO)
Subject: OECD Expert Group on Honey Bee Toxicity Testing

Dear Marianna Paolino,

It was a great pleasure to meet you during the meeting of the OECD Expert Group on Honey Bee Toxicity Testing this week. The meeting provided an opportunity to meet a wide range of people; however, I am very appreciative for the opportunity to interact with representatives of organizations tasked to regulate pesticides. While the European Commission is frequently discussed in the context of its efforts to understand the potential role that pesticides may be playing in pollinator declines, the meetings this week afforded the first opportunity that I have had to meet someone who works with the European Commission. I hope that we will be able to establish a clear line of communication between the U.S. Environmental Protection Agency's (EPA) Office of Pesticide Programs and the European Commission. To that end, if you have any questions about EPA's risk assessment framework for pollinators that Ms. Kris Garber and I presented at the OECD meeting or if you have any other questions regarding pesticide regulation in the United States, please do not hesitate to contact me.

Sincerely,

Tom Steeger

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